

THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DANIEL ANDERSEN,	)	
	)	
Plaintiff,	)	16 cv 1963
	)	
v.	)	District Judge Virginia M. Kendall
	)	
CITY OF CHICAGO, et al.	)	
	)	
Defendants.	)	JURY TRIAL DEMANDED

**PARTIES' COMBINED TESTIMONY DESIGNATIONS AND OBJECTIONS**

The Parties, by and through their attorneys, respectfully submit the designations for Mr. John Stout. The Parties state as follows:

1. The Parties respectfully submit their updated designations and objections for the deposition testimony of John Stout, attached as Exs. A–C.
2. The Parties have previously submitted their respective designations for Mr. Stout's deposition with their pre-trial order filing. Dkt. 798-3 at 6-7 (parties' original deposition designations); 798-4 (Deposition of Mr. Stout on March 20, 2017, in *Hood v. City of Chicago*, 16 C 1970 (N.D. Ill.); 798-7 (Deposition of Mr. Stout on March 21, 2017 in this case).
3. By way of background, Mr. Stout was deposed on back-to-back days on March 20 & 21, 2017, in this case and another pending case due to the need for counsel to travel to Florida for his deposition and the witness's availability.
4. The parties' updated proposed deposition designations for Mr. Stout's March 21, 2017 deposition in this case are highlighted in Exhibit B.
5. In addition, the parties' deposition designations for Mr. Stout's March 20, 2017 deposition in *Hood* are highlighted in Exhibit C.

6. The Parties are respectful and appreciative of the Court's time and attention as well as its patience with regard to this matter.

May 16, 2021

Respectfully submitted,

/s/ John Hazinski  
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